

Exhibit C



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December 4, 2020

PERSONAL AND CONFIDENTIAL

VIA E-MAIL (CWENNER@BSFLLP.COM)

Craig Wenner
Boies Schiller Flexner LLP
55 Hudson Yards
20th Floor
New York, NY 10001

**Re: City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.,
19 Civ. 2645 (AJN) (KHP)**

Dear Mr. Wenner:

Reference is made to the March 10, 2020 Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (the "Subpoena") served on Moses & Signer LLP (the "Firm" or "M&S"). In accordance with your November 13, 2020 endorsed letter to Magistrate Judge Parker [ECF Nos. 236 and 237], enclosed herein please find documents Bates stamped [FS008-FS158] responsive to the Subpoena. In addition to the Firm's prior objections to the Subpoena, all of which are incorporated herein, the Firm additionally makes and incorporates into its responses the following objections to the Subpoena:

1. M&S objects to the Subpoena because the Subpoena requests impose obligations on M&S beyond that provided for by the applicable rules.
2. M&S objects to the Subpoena as its time frame (from January 1, 2013 to the present) is overbroad and has subsequently been narrowed, by agreement, to the end of 2014.
3. M&S objects to the Subpoena requests to the extent that each seeks documents and other materials which would be inadmissible as evidence in any trial of this matter and/or is



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not reasonably calculated to lead to the discovery of admissible evidence. By propounding these responses and producing documents in accordance with its obligations under the applicable rules, M&S does not concede that any document it will (or may hereafter) produce in response to any particular request is material, probative, relevant, or otherwise admissible proof concerning any factual allegation in this case. M&S expressly preserves all appropriate objections to the materiality, probative value, relevancy, and/or admissibility of every document produced, notwithstanding the purpose(s) for which its disclosure is sought.

4. M&S objects to each Subpoena request to the extent that each seeks the production of documents which are already known to counsel, have been previously provided, or have been previously produced.

5. M&S objects to each of the definitions to the extent that it seeks to impose any obligation on M&S to produce any documents or information in the possession of entities and people other than M&S, and to the extent that it seeks to compel M&S to produce documents not in M&S's custody or control but rather in that of any present or past agents, employees, affiliates, related companies, subsidiaries, representatives, etc.

6. M&S reserves its right to modify, amend, and/or supplement its responses and objections at any time before trial.

7. M&S objects to the Subpoena requests to the extent they call for information and materials protected by the attorney-client privilege, the work product doctrine or any other applicable privilege or immunity. Information or documents produced, as to which a privilege could be asserted, shall not constitute a waiver, and M&S reserves the right to recall any such documents as inadvertently produced.



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8. Any disclosure by M&S in response to an otherwise objectionable Subpoena request shall neither be deemed nor constitute a waiver of its general objections.

9. M&S's response to the Subpoena reflects the facts and circumstances as of the date such responses were provided, after a duly diligent investigation. M&S reserves its right to supplement and amend its responses to the Subpoena where necessary or appropriate upon further investigation.

10. Subject to, and explicitly incorporating, each of the foregoing objections to the Subpoena, enclosed herewith please find documents responsive to each of the Subpoena requests.

We remain available to address any other issue you may have to avoid a request for judicial intervention in respect to discovery issues.

Very truly yours,

MOSES & SINGER LLP

/s John Baranello

John Baranello

Enclosures

Cc: Robert Wolf, Esq.